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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

January 13, 2022

By ECF and Email

The Honorable Denise L. Cote Daniel Patrick Moynihan **United States Courthouse** 500 Pearl Street New York, New York 10007

> Re: United States v. Pedro Reynoso, 20 Cr. 388-5 (DLC)

Dear Judge Cote:

The Government writes to request, with defense counsel's consent, that the violation-ofsupervised-release conference for tomorrow, January 14, 2022, at 3:00 p.m., be adjourned for sixty days or to a date and time that is convenient for the Court.

The Government makes this request in light of the filing in this District of a federal complaint earlier today that charges the defendant with two counts of carjacking, in violation of 18 U.S.C. § 2119(1); one count of the use of a firearm during a carjacking, in violation of 18 U.S.C. § 924(c); and one count of conspiracy to commit carjacking, in violation of 18 U.S.C. § 371. The complaint is attached as Exhibit A. It is anticipated that the defendant will be presented on the charges in the complaint the week of January 16, 2022.

Because of the substantial overlap in conduct alleged in the complaint and in the Probation Department's specifications, the Government respectfully requests that the Court adjourn tomorrow's conference for sixty days or to a date and time that is convenient for the Court, so that

The conference is adjustined to

3/11/22 at 200 pm.

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1/13/23

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the defendant can be presented on the complaint and the parties can better assess how those allegations in the complaint will be resolved.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

by: /s/
Daniel H. Wolf / Alexander Li
Assistant United States Attorneys
(212) 637-2337 / -2265

cc: César de Castro, Esq. (counsel to Pedro Reynoso) Maggie Lynaugh (by email)